

DAVID A. ROSENFELD, Bar No. 058163  
WEINBERG, ROGER & ROSENFELD  
A Professional Corporation  
1001 Marina Village Parkway, Suite 200  
Alameda, California 94501  
Telephone (510) 337-1001  
Fax (510) 337-1023  
E-Mail: drosenfeld@unioncounsel.net

IRON WORKERS LOCAL 229, INTERNATIONAL  
ASSOCIATION OF BRIDGE, STRUCTURAL, ORNAMENTAL  
AND REINFORCING IRON WORKERS, AFL-CIO

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
REGION 21

PRO WORKS CONTRACTING, INC.

and

IRON WORKERS LOCAL 229,  
INTERNATIONAL ASSOCIATION OF  
BRIDGE, STRUCTURAL, ORNAMENTAL  
AND REINFORCING IRON WORKERS,  
AFL-CIO

Cases 21-CA-161599  
21-CA-162578

**JOINDER IN MOTION TO TRANSFER  
CASE TO THE BOARD AND MOTION  
FOR DEFAULT JUDGMENT**

The Charging Party joins in the Motion to Transfer Cases and Motion for Default Judgment.

Additionally, the Charging Party requests special remedies, including the following:

- (1) Any Notice should be posted for the length of time between when the unfair labor practices were committed and when the Notices are actually posted;
- (2) The employer should be required to post for five years, the ill-fated Board Notice which was intended to be posted by all employers but was enjoined, unfortunately, by the Court;
- (3) The employer should be ordered to buy 10 copies of the book entitled "California Workers' Rights" and pass those out to employees;

(4) The employer should be required to allow the Union to visit worksites and job sites for a year for 30 minutes per week for a year;

(5) The Notice should read that the employer has been found to have violated the National Labor Relations Act, rather than simply mealy mouth words about posting a Notice.

Dated: August 2, 2017

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

By: /s/ David A. Rosenfeld  
DAVID A. ROSENFELD

IRON WORKERS LOCAL 229,  
INTERNATIONAL ASSOCIATION OF BRIDGE,  
STRUCTURAL, ORNAMENTAL AND  
REINFORCING IRON WORKERS, AFL-CIO

139735\926630

## PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction this service was made. I am over the age of eighteen years and not a party to the within action.

On August 2, 2017, I served the following documents in the manner described below:

### JOINDER IN MOTION TO TRANSFER CASE TO THE BOARD AND MOTION FOR DEFAULT JUDGMENT

- ☒ (BY U.S. MAIL) I am personally and readily familiar with the business practice of Weinberg, Roger & Rosenfeld for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Alameda, California.

On the following part(ies) in this action:

Russell Coker, Inc.  
Attention: Tom Coker  
9883 Chocolate Summit Drive  
El Cajon, CA 92021

Pro Works Contracting, Inc.  
Attention: Anson David, Derek Frost  
10612 Prospect Avenue, Suite 105  
Santee, CA 92071

- ☒ BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from [kkempler@unioncounsel.net](mailto:kkempler@unioncounsel.net) to the email addresses set forth below.

On the following part(ies) in this action:

Robert MacKay ([robert.mackay@nlrb.gov](mailto:robert.mackay@nlrb.gov))  
Neil A. Warheit ([neil.warheit@nlrb.gov](mailto:neil.warheit@nlrb.gov))  
Counsel for the General Counsel  
Region 21, San Diego Regional Office  
555 West Beech Street, Room 418  
San Diego, CA 92101

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 2, 2017, at Alameda, California.

/s/ Karen Kempler  
Karen Kempler